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July 17, 2025

Via ECF:

The Honorable Judge Jennifer E. Willis United States Magistrate Judge Southern District of New York 40 Foley Square, Room 425 New York, NY 10007 The extension request is GRANTED. SO ORDERED.

ENNIFER E. WILLIS

UNITED STATES MAGISTRATE JUDGE July 21, 2025

Re: Arrabito v. First Unum Life Insurance Company et al Case No.: 1:24-cv-05054-GHW-JW

Dear Magistrate Judge Willis:

In accordance with Subsection (1)(E) of the Court's Individual Rules of Practices in Civil Cases and Local Rule 7.1(d), Plaintiff requests the Court stay and extend the current joint status report deadline set for July 18, 2025, by 14 days, or until August 1, 2025.

In support of this motion, the parties note as follows:

- Following a discovery hearing on July 2, 2025, the Court instructed the parties to
 meet and confer about mutually agreeable topics of questioning for the deposition of
 Dr. Neal Greenstein and provide a status update to the Court concerning that
 discussion by July 18, 2025.
- 2. The parties are still conferring about mutually agreeable topics of questioning, but—due to delays related to holiday travel and other conflicts—will need more time

beyond July 18, 2025, to finish this discussion and hopefully reach agreement without the need for further judicial intervention.

To allow the parties an opportunity to finish conferring about mutually agreeable deposition topics and potentially avoid the need for further judicial intervention, the parties ask the Court to extend the joint status report deadline by 14 days, or until August 1, 2025.

Respectfully submitted this 17th day of July 2025.

BY: s/Noah Breazeale

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